

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VICTOR BALLAST, LUIS SIMONE, RICHARD  
WALKER and ORLANDO OBRET, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiffs,

-v-

WORKFORCE 7 INC., CONSOLIDATED EDISON  
COMPANY of NEW YORK, INC., VALI  
INDUSTRIES, INC. and RONALD HILTON, Jointly  
and Severally,

Defendants.

Civil Action No. 1:20-cv-03812 (ER)

**~~[PROPOSED]~~ REVISED CIVIL  
CASE DISCOVERY PLAN AND  
SCHEDULING ORDER**

**WHEREAS**, the Court having entered a Revised Civil Case Discovery Plan and Scheduling Order on February 24, 2025 (Dkt. No. 351) and a briefing schedule for Plaintiffs' Motion for Class Certification on April 25, 2025 (*See* Min. Entry Dated April 30, 2025);

**WHEREAS** the Parties have agreed to modify the February 24, 2025 Revised Civil Case Discovery Plan and Scheduling Order and April 25, 2025 briefing schedule for Plaintiffs' Motion for Class Certification, subject to the Court's approval;

**IT IS HEREBY ORDERED:**

1. The terms of the February 24, 2025 Revised Civil Case Discovery Plan and Scheduling Order and April 25, 2025 briefing schedule shall continue in full force and effect except for the following modifications:

- a. Plaintiffs and Workforce7 Inc., Ronald Hilton and Vali Industries Inc. to file their Motion for Preliminary Approval of Class Settlement on or before June 23, 2025;
- b. Plaintiffs shall file their Motion for Class Certification on or before June 6,

2025;

- c. Defendants shall file their Opposition to Plaintiffs' Motion on or before July 14, 2025;
- d. Plaintiffs shall file their Reply in support of their Motion on or before July 28, 2025;
- e. Expert disclosures due on or before June 20, 2025;
- f. Fact discovery, including all depositions of fact and Rule 30(b)(6) witnesses regarding Count 10 shall be completed by August 5, 2025;
- g. Expert reports regarding Count 10 shall be served no later than August 19, 2025;
- h. Rebuttal expert reports regarding Count 10 shall be served no later than September 18, 2025;
- i. Expert witness depositions, and all discovery regarding Count 10 shall be completed no later than November 3, 2025;
- j. Any dispositive motions with respect to Count 10 must be filed no later than December 15, 2025.

**SO ORDERED.**

Dated: May 21, 2025  
New York, New York

A handwritten signature in blue ink, appearing to read 'Edgardo Ramos', is written above a horizontal line.

HONORABLE EDGARDO RAMOS  
United States District Judge